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December 15, 2020

Via ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

**Re: *Partnership Reinsurance Co. v. RPM Mortgage, Inc.*, No. 18 Civ. 5831 (PAE)
Ohio Dep’t of Ins. v. RPM Mortgage, Inc., No. 20 Misc. 590 (PAE)
Request for Extension of Time to Complete Non-Party Discovery**

Dear Judge Engelmayer,

This firm was recently retained as counsel for non-party Ohio Department of Insurance (“ODI”). Pursuant to Part 1.E of the Court’s Individual Rules and Practices, ODI respectfully requests an extension of time to complete its document production and to make a witness available for a deposition in response to the subpoena issued by Defendant RPM Mortgage, Inc.

The current deadline for ODI to complete its non-party discovery pursuant to the Court’s December 2, 2020 Order is December 17, 2020. ODI hereby requests a four week extension of this deadline, to January 13, 2021. ODI has made no previous requests for extensions of time in this matter. ODI respectfully requests this extension because it needs additional time to gather and review potentially responsive documents and to adequately prepare a witness for deposition, if necessary. A number of factors arising simultaneously, including COVID-19 restrictions, Ohio cost savings days (mandatory unpaid time off for all non-exempt state employees), and holiday-related personnel absences, will make meeting the December 17 deadline exceedingly burdensome. We have conferred with counsel for each of the respective parties and each consents to ODI’s request for an extension. Counsel have further represented that extending ODI’s deadline to complete its discovery obligations until January 13, 2021 will not affect any other scheduled dates pursuant to the Court’s Revised Scheduling Order, dated November 25, 2020.

We thank Your Honor for considering this request.

Respectfully,



Niraj J. Parekh

cc: Counsel of Record (via ECF)